



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2011R00783

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 24, 2015

By ECF

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Re: United States v. Agron Hasbajrami
Criminal Docket No. 11-623 (S-1) (JG)

Dear Sirs:

The government hereby memorializes its disclosure earlier today of sensitive discovery information and provides notice of its intent to call an expert witness at trial.

The government previously disclosed that it introduced a cooperating source to the defendant through online communications and previously disclosed email communications between the cooperating source and the defendant. The government hereby memorializes its confirmation with defense counsel earlier today of the email address used by the cooperating source. This information was provided under the terms of the Protective Order Pertaining to Unclassified Discovery Materials entered by the Court on November 16, 2011.

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that the government intends to call Evan Kohlmann to testify as an expert witness at trial.

Mr. Kohlmann is an international terrorism consultant, who specializes in tracking Islamic extremist groups, including al Qaeda and its affiliates, particularly with respect to the role of electronic media in the global jihadist movement. Mr. Kohlmann holds a degree in International Politics from the Edmund A. Walsh School of Foreign Service (Georgetown University), and a Juris Doctorate from the University of Pennsylvania Law School. Mr. Kohlmann is the recipient of a certificate in Islamic studies from the Prince Alwaleed bin Talal Center for Muslim Christian Understanding at Georgetown University.

He currently works as a Senior Partner at Flashpoint Global Partners, a New York-based security consulting firm, as well as an on air analyst for NBC News in the United States.

In addition, Mr. Kohlmann is the author of the book Al Qaida's Jihad in Europe: the Afghan Bosnian Network. Mr. Kohlmann has previously been qualified as an expert on the subject of Islamic extremism and the use of electronic media by terrorists and foreign terrorist organizations and has testified as an expert witness in numerous federal criminal proceedings relating to terrorism, including cases within the Eastern and Southern Districts of New York.

In connection with the trial in the above-referenced case, the government expects that Mr. Kohlmann will testify as to the background, make-up and significance of certain terrorists and terrorist organizations that will be the subject of other witness testimony in this case. Mr. Kohlmann will also testify as to the existence of support networks, including networks of financial and logistical support, for jihadist terrorist organizations, and the utility of foreign fighters to such organizations. Mr. Kohlmann will testify about the use of online websites and forums by jihadist terrorist organizations to raise financial and logistical support and recruit foreign fighters to such organizations, and the content of certain websites at the time of the events in the government's case. Mr. Kohlmann will also testify as to the routes that foreign fighters use to travel to the Federally Administrated Tribal Areas ("FATA") of Pakistan.

The government further expects that Mr. Kohlmann will testify regarding how terrorists use propaganda to recruit personnel into their mission to promote violent, global jihad, and how knowledge of such propaganda materials facilitates the operational, cultural and social assimilation of foreign fighters into jihadist groups operating abroad. In particular, Mr. Kohlmann will testify about the origin, use, content and dissemination of videos as propaganda tools, including the videos previously disclosed in unclassified discovery, Bates-numbered 428. Mr. Kohlmann will also testify as to the dates that certain extremist propaganda materials were first published by foreign terrorist organizations.

In addition, the government expects that Mr. Kohlmann will testify as to the common meaning and usage of certain jihadist terminology. Mr. Kohlmann will also testify as to places of interest in and around the FATA.

If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
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cc: Clerk of Court (JG) (by ECF)